

Kellie Martinec

From: Mike McGuire <mmcguire@rpgcd.org>
Sent: Saturday, March 30, 2013 6:19 PM
To: rulescoordinator
Subject: Rule 3.13 Comments
Attachments: Comment Letter to RRC on Rule 3.13.pdf

Attention Rules Coordinator, attached for submission are comments to proposed Commission Rule 3.13 on behalf of the Rolling Plains Groundwater Conservation District.

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March 29, 2013

Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, Texas 78711-2967

Re: Comments on Proposal to amend 16 Tex. Admin. Code § 3.13

To Rules Coordinator:

The Rolling Plains Groundwater Conservation District ("District") appreciates the opportunity to comment on the proposed changes to Rule 3.13, regarding "Casing, Cementing, Drilling, and Completion Requirements." We thank the Railroad Commission and its Staff for the initiative to update this rule, as well as Railroad Commission Rule §3.9 and §3.13. In response to the proposed changes, as published in the Texas Register on February 15, 2013, the District submits these comments and suggested revisions for your consideration.

Of particular concern to the District are the minimum cementing requirements for oil and gas waste disposal wells included in Commission Rule 3.13. As published in the Texas Register, Commission Rule 3.13 establishes minimum cementing requirements depending on the method utilized for determining the top of cement. The District believes that a uniform minimum cementing requirement is more appropriate. For example, requiring a minimum of 500 feet across and above all formations permitted for injection would better serve as protection for underground sources of drinking water. Specifically, the District proposes the following revisions:

1. **Title 16, Section 3.13(a)(4)(C)** of the Texas Administrative Code: "Casing shall be cemented across and extending at least 600 feet above all formations permitted for injection under Section 3.9 of this title (relating to Disposal Wells), or Section 3.46 of this title (relating to Fluid Injection into Productive Reservoirs), within one-quarter mile of the proposed well location in the following manner:"

2. **Title 16, Section 3.13(a)(4)(C)(ii)** of the Texas Administrative Code:

"If the top of cement is determined through the performance of a temperature survey, across and extending ~~250~~ 500 feet (measured depth) above the permitted formation(s).

3. **Title 16, Section 3.13(a)(4)(C)(iii)** of the Texas Administrative Code: "... if the top of cement is determined through the performance of a cement evaluation log, across and extending ~~100~~ 500 feet (measured depth) above the permitted formation(s)."

Thank you again for the opportunity to provide these comments and take part in the rulemaking process.

Sincerely,

A handwritten signature in cursive script that reads "Mike McGuire".

Mike McGuire
General Manager